
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
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DOMINGO SANTOS :

I, Lucille M. Pezzullo, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about October 11, 2006, in Morris County, in the District of New Jersey, and elsewhere, defendant DOMINGO SANTOS did:

knowingly and wilfully possess material which contained at least three images of child pornography, as defined in 18 U.S.C. § 2256, which were shipped and transported in interstate and foreign commerce, including by computer, and were produced using materials that were shipped and transported in interstate and foreign commerce, including by computer,

in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

I further state that I am a Special Agent for United States Immigration and Customs Enforcement, and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Lucille M. Pezzullo, Special Agent
Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence,
October 17, 2006 at Newark, New Jersey

HONORABLE MADELINE COX ARLEO
UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

I, Lucille M. Pezzullo, a Special Agent with United States Department of Homeland Security, Immigration and Customs Enforcement (“ICE”), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:

1. On or about October 11, 2006, law enforcement officers conducted a search of a computer in the possession of defendant Domingo Santos (hereinafter “defendant SANTOS”).

2. On or about October 11, 2006, law enforcement officers reviewed the contents of defendant SANTOS’s computer hard drive which had been found in defendant SANTOS’s possession. Among the files on the hard drive, which was manufactured in China, were more than forty-five (45) videos of what appears to be child pornography, as defined by Title 18, United States Code, Section 2256(8). Three of the videos, which were found on defendant SANTOS’s computer hard drive, are described as follows:

- a. **Video Number One:** This video, which is approximately two minutes and twenty-two seconds in length, depicts a prepubescent female engaged in sexual conduct with an adult male. The prepubescent female appears to be wearing a blue dress with a white shirt but is nude below her waist as she sits on a bed with a multi-colored quilt cover. The adult male is standing facing the prepubescent female, and his erect penis is visible. The prepubescent female places her left hand on the male’s erect penis and she begins performing fellatio on the adult male. The prepubescent female then lies on the bed with her legs spread apart to the side while the adult male engages in oral sex. A pacifier is visible in the prepubescent female’s mouth.
- b. **Video Number Two:** This video, which is approximately forty-two seconds in length, depicts an adult male engaging in sexual intercourse with a prepubescent female. The female is fully nude and is seen lying on her back on a beige color carpet with her legs spread apart to the side, facing the adult male. The right hand of the adult male is holding the female’s left leg on the floor. The adult male proceeds to engage in intercourse with the prepubescent female.
- c. **Video Number Three:** This video, which is approximately two minutes in length, depicts a prepubescent female engaged in sexual conduct. The female is fully nude and can be seen lying on her back with both legs lifted in the air, exposing her genital area. An erect penis is visible and appears in the vicinity of the prepubescent female’s genital area.

3. Based upon my training and experience, and to the best of my knowledge, the videos described in paragraphs 2a through 2c above, based upon their location and method of storage on defendant SANTOS's computer hard drive, were downloaded from the Internet.